



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

P.O. BOX 47600 • Olympia, Washington 98504-7600 • (206) 459-6000

WAD 0169  
11.16.93

November 16, 1993

Brian Jones  
Environmental Superintendent  
ITT Rayonier, Inc. PAD  
P. O. Box 191  
Port Angeles, Washington 98390

RE: EPA and Ecology's multimedia inspection, ITT Rayonier, Inc., Port Angeles, WA

Dear Mr. Jones:

From February 2 through February 10, 1993, personnel from the Environmental Protection Agency and Ecology conducted a multimedia inspection at the ITT Rayonier, Inc. Port Angeles Division chemical pulp mill. As a result of this inspection the following items must be rectified by your company:

1. A penalty was issued for the pH exceedences reported on your Discharge Monitoring Report for December, 1992 with the other exceedences that were reported for July and August, 1993. Your company should look for different controls, use weaker acids or bases in the final pH adjustment, and/or install a method to reroute the wastewater into other tanks in case of extreme swings in pH in order to maintain NPDES permit compliance.
2. Sixteen used transformers and capacitors were discovered during the inspection. Three of these transformers tested PCB at 2 mg/kg, 4 mg/kg, and 6 mg/kg by modified EPA method 8080. By telecon, you have informed Ecology that these transformers have been moved from the "boneyard" into an area that has containment. Also, you have informed Ecology that you are and have been negotiating to sale these transformers. Please provide this office with documentation of these negotiations. Either the sale of these transformers must be finalized or a disposal method must be achieved in accordance with the dangerous waste regulations. With this documentation, provide the time limit to these negotiations, that is, when the negotiation will be stop and final disposal will be taken.
3. There were unsubstantiated indications that the mill had been dumping small amounts of acetone on the hog fuel pile before the inspection. Provide documentation that the disposal by dumping on the hog fuel pile of acetone has stopped. As part of this documentation, provide information on how your company will enforce the stoppage plan.
4. Your company must update the SPCC and treatment system operating plans in accordance with permit conditions.
5. You must consider method to eliminate reintroduction of solids into the wastewater discharge stream in accordance with G16 of your NPDES permit during shutdowns. Please provide a best management plan within six months to deal effectively with this problem.

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Mr. Brian Jones  
November 16, 1993  
Page 2

6. Pursuant to WAC 173.303.170.1.a, you must designate all waste streams. If you have not already designated the following sources of possible dangerous wastes, please do so:

- a. Weld shop grit
- b. Pump shop blaster grit
- c. Paint shop blaster grit
- d. Lime grits
- e. Clinkers form power boiler No. 6.

At the inspection your company could not provide records showing that the above waste streams had been designated prior to past disposal events. Within thirty days following receipt of this letter, you must provide documentation that the above streams were designated individually prior to disposal. You are reminded that your facility must maintain designation records for a period of five years in accordance with WAC 173.303.3 whether the tested waste designates or not.

- 7. Your training officer must break out the training related to handling of dangerous wastes.
- 8. Improvements should be undertaken in record keeping relating to the land disposal restriction, (LDR), paper trail. Several LDR violations were noted at the inspection. At this time, Ecology does not have regulatory authority over violations related to LDR's. It is expected that regulations concerning LDR will be promulgated in 1994. Therefore, future violations will be subject to enforcement by Ecology. Since EPA has authority over LDR's violations, they may take enforcement action on the LDR notification violations.
- 9. Your company needs to document the weekly inspection performed on dangerous waste areas. Provide documentation on these inspections.

If you should have any questions, please call me at (206) 586-0554.

Sincerely,

*Don Nelson*

Don Nelson, P.E.  
Industrial Section  
Department of Ecology

cc: David Ragsdales, EPA-WOO  
June Alexandra, EPA  
Paul Boys, EPA  
Tom Post, EPA ✓  
Ann Postuis, EPA

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